



ENVIRONMENTAL SERVICES DEPARTMENT

AIR QUALITY DIVISION

1001 N. Central Avenue
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Technical Guidance #TG98-004

Rule: 345, subsection 305.1

June 17, 1998

**Subject: Water cleanup and the status
of gun-cleaning machine requirements.**

Issue: (1) Does a gun-cleaning machine need to be used at a vehicle-refinishing facility that requires a permit, if a gun is cleaned solely with water as the solvent? Subsection 305.1 requires that a gun-cleaning machine be used by all vehicle refinishers that require a permit.

(2) Also in subsection 305.1, what does "adjunct to the cleaning machine function..." mean, exactly?

Discussion: (1) The purpose of requiring a gun cleaning machine was to limit VOC emissions from the VOC-containing cleaning solvents that have typically been used to clean guns.

(2) It was the intent of the principal writer of Rule 345 (R. Kramer-Howe) that the word "adjunct" mean that manual precleaning of a spray-gun outside of a cleaning-machine necessarily was always followed by the gun's being cleaned in the cleaning-machine using a standard cleaning cycle of the machine.

Conclusion: (1) If the cleaning solvent is water only, a gun cleaning machine is not required.

(2) "Adjunct" means that if manual precleaning of a spray-gun with a VOC-containing solvent is done outside a cleaning-machine at a vehicle refinishing facility that requires a permit, then – in every case – such precleaning shall be followed by normal cleaning in a cleaning-machine. The only exception to this applies to water-borne paint that has hardened onto the gun and, after manual pre-cleaning with a VOC-containing solvent, gets its final cleaning solely with water.

Committee Members Participating in the Final Vote

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